

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

WILMINGTON TRUST, NATIONAL
ASSOCIATION, SOLELY IN ITS CAPACITY AS
TRUSTEE FOR THE REGISTERED HOLDERS OF
ASHFORD HOSPITALITY TRUST 2018-KEYS
COMMERCIAL MORTGAGE PASS-THROUGH
CERTIFICATES, acting by and through Trimont Real
Estate Advisors, LLC as Special Servicer under the
Pooling and Servicing Agreement dated as of July 16,
2018,

Plaintiff,

v.

ASHFORD TIPTON LAKES LP; ASHFORD
SCOTTSDALE LP; ASHFORD PHOENIX AIRPORT
LP; ASHFORD HAWTHORNE LP; ASHFORD
PLYMOUTH MEETING LP; ASHFORD SAN JOSE
LP; and ASHFORD LV HUGHES CENTER LP,

Defendants.

Civil Action File No.
1:23-cv-09989-AT

PLAINTIFF'S CORPORATE DISCLOSURE STATEMENT

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, the undersigned
counsel for Plaintiff discloses and certifies the following:

Part I

Complete this portion in all cases.

Identify any corporate affiliates, subsidiaries, and/or parent corporation and any publicly held corporation owning 10% or more of the stock of any non-governmental corporate party or intervenor. If there are no such corporations, the form shall so state.

1. Plaintiff Wilmington Trust, National Association brings this action not in its individual capacity, but solely in its capacity as trustee for the Registered Holders Ashford

Hospitality Trust 2018-Keys Commercial Mortgage Pass-Through Certificates, acting by and through Trimont Real Estate Advisors, LLC as Special Servicer under the Ashford Hospitality Trust 2018-KEYS Commercial Mortgage Pass-Through Certificates Pooling and Servicing Agreement, dated as of July 16, 2018. Wilmington Trust is a national banking association organized under the laws of the United States and wholly-owned subsidiary of Wilmington Trust Corporation, with its designated main office located in Wilmington, Delaware.

2. M&T Bank Corporation, the parent corporation of Wilmington Trust Corporation, is a publicly traded corporation organized under the laws of New York. No other publicly held corporation owns 10% or more of M&T Bank Corporation's stock. The Vanguard Group, Inc., which Plaintiff understands is not publicly traded, owns more than 10% of M&T stock.

Part II

Complete this portion only if jurisdiction is based on diversity of citizenship under 28 U.S.C. § 1332(a).

Name and identify the citizenship of every individual or entity whose citizenship is attributed to that party or intervenor for purposes of establishing jurisdiction based upon diversity of citizenship (note: the citizenship of an L.L.C. is the citizenship of each of its members).

1. Plaintiff Wilmington Trust is a national banking association with its designated main office located in Wilmington, Delaware. As a national bank, Wilmington Trust is a citizen of Delaware, which again is the site of its main office.

2. Defendant Ashford Tipton Lakes LP ("*Ashford Tipton*") is a limited partnership organized under Delaware law. Ashford Tipton's partners are Ashford Tipton Lakes GP, LLC, and Ashford Senior A LLC. Ashford Senior A LLC also is the sole member of Ashford Tipton Lakes GP, LLC. The sole member of Ashford Senior A LLC is Ashford Junior

A LLC. The sole member of Ashford Junior A LLC is Ashford Hospitality Limited Partnership. Ashford Hospitality Limited Partnership's partners are Ashford OP General Partner LLC, Ashford OP Limited Partner, LLC, 1080 Partners LP, A7PP Holdings HSV LLC, AMS Burning Tree, LLC, Arden Seven Penn Partners, LP, Ashford Financial Corporation, Ashford Hospitality Trust, Inc., JoyceMadgra LLC, Kogod Family Group, LLC, MC II Associates (a partnership), MMS Bradley, LLC, Texas Yarrow – 2021 PS (a partnership), Texas Yarrow – 2022 PS (a partnership) and various individuals, individual trusts, and a decedent's estate who are citizens of California, Florida, Georgia, Illinois, Maryland, New York, Pennsylvania, Texas, and Virginia. The sole member of Ashford OP General Partner LLC and Ashford OP Limited Partner LLC is Ashford Hospitality Trust, Inc., which is a Maryland corporation with its principal place of business in Maryland. Based on available information, the partners of 1080 Partners LP are 5280 Holding Corp., which is a Texas corporation with its principal place of business in Texas, and individuals who are citizens of Texas. Based on available information, the partners of A7PP Holdings HSV LLC and Arden Seven Penn Partners, LP, are individuals who are citizens of Pennsylvania. Based on available information, the member of AMS Burning Tree, LLC is an individual who is a citizen of Virginia. Ashford Financial Corporation is a Texas corporation with its principal place of business in Texas. Based on available information, the member of JoyceMadgra LLC is an individual who is a citizen of Texas. The members of the Kogod Family Group, LLC are individuals who are citizens of Florida, New York, Texas, and Virginia. Based on available information, the partners of MC II Associates are individuals who are citizens of New York. The member of MMS Bradley, LLC is an individual who is a citizen of Virginia. The partners of Texas Yarrow – 2021 PS and Texas Yarrow – 2022 PS are citizens of Texas.

Ashford Tipton therefore is a citizen of California, Florida, Georgia, Illinois, Maryland, New York, Pennsylvania, Texas, and Virginia.

3. Defendant Ashford Scottsdale LP (“*Ashford Scottsdale*”) is a limited partnership organized under Delaware law. Ashford Scottsdale’s partners are Ashford Scottsdale GP LLC and Ashford Senior A LLC. Ashford Senior A LLC also is the sole member of Ashford Scottsdale GP, LLC. The sole member of Ashford Senior A LLC is Ashford Junior A LLC. The sole member of Ashford Junior A LLC is Ashford Hospitality Limited Partnership. Ashford Hospitality Limited Partnership’s partners are Ashford OP General Partner LLC, Ashford OP Limited Partner, LLC, 1080 Partners LP, A7PP Holdings HSV LLC, AMS Burning Tree, LLC, Arden Seven Penn Partners, LP, Ashford Financial Corporation, Ashford Hospitality Trust, Inc., JoyceMadgra LLC, Kogod Family Group, LLC, MC II Associates (a partnership), MMS Bradley, LLC, Texas Yarrow – 2021 PS (a partnership), and Texas Yarrow – 2022 PS (a partnership) and various individuals, individual trusts, and a decedent’s estate that are citizens of California, Florida, Georgia, Illinois, Maryland, New York, Pennsylvania, Texas, and Virginia. The sole member of Ashford General Partner LLC and Ashford OP Limited Partner LLC is Ashford Hospitality Trust, Inc., which is a Maryland corporation with its principal place of business in Maryland. Based on available information, the partners of 1080 Partners LP are 5280 Holding Corp., which is a Texas corporation with its principal place of business in Texas, and individuals who are citizens of Texas. Based on available information, the partners of A7PP Holdings HSV LLC and Arden Seven Penn Partners, LP, are individuals who are citizens of Pennsylvania. Based on available information, the member of AMS Burning Tree, LLC is an individual who is a citizen of Virginia. Ashford Financial Corporation is a Texas corporation with its principal place of business in Texas. Based on available information, the member of

JoyceMadgra LLC is an individual who is a citizen of Texas. The members of the Kogod Family Group, LLC are individuals who are citizens of Florida, New York, Texas, and Virginia. Based on available information, the partners of MC II Associates are individuals who are citizens of New York. The member of MMS Bradley, LLC is a citizen of Virginia. The partners of Texas Yarrow – 2021 PS and Texas Yarrow – 2022 PS are citizens of Texas. Ashford Scottsdale therefore is a citizen of California, Florida, Georgia, Illinois, Maryland, New York, Pennsylvania, Texas, and Virginia.

4. Defendant Ashford Phoenix Airport LP (“*Ashford Phoenix*”) is a limited partnership organized under Delaware law. Ashford Phoenix’s partners are Ashford Phoenix Airport GP LLC and Ashford Senior A LLC. Ashford Senior A LLC also is the sole member of Ashford Phoenix GP, LLC. The sole member of Ashford Senior A LLC is Ashford Junior A LLC. The sole member of Ashford Junior A LLC is Ashford Hospitality Limited Partnership. The sole member of Ashford Senior A LLC is Ashford Junior A LLC. The sole member of Ashford Junior A LC is Ashford Hospitality Limited Partnership. Ashford Hospitality Limited Partnership’s partners are Ashford OP General Partner LLC, Ashford OP Limited Partner, LLC, 1080 Partners LP, A7PP Holdings HSV LLC, AMS Burning Tree, LLC, Arden Seven Penn Partners, LP, Ashford Financial Corporation, Ashford Hospitality Trust, Inc., JoyceMadgra LLC, Kogod Family Group, LLC, MC II Associates (a partnership), MMS Bradley, LLC, Texas Yarrow – 2021 PS (a partnership), Texas Yarrow – 2022 PS (a partnership) and various individuals, individual trusts, and a decedent’s estate that are citizens of California, Florida, Georgia, Illinois, Maryland, New York, Pennsylvania, Texas, and Virginia. The sole member of Ashford General Partner LLC and Ashford OP Limited Partner LLC is Ashford Hospitality Trust, Inc., which is a Maryland corporation with its principal place of business in Maryland.

Based on available information, the partners of 1080 Partners LP are 5280 Holding Corp., which is a Texas corporation with its principal place of business in Texas, and individuals who are citizens of Texas. Based on available information, the partners of A7PP Holdings HSV LLC and Arden Seven Penn Partners, LP, are individuals who are citizens of Pennsylvania. Based on available information, the member of AMS Burning Tree, LLC is an individual who is a citizen of Virginia. Ashford Financial Corporation is a Texas corporation with its principal place of business in Texas. Based on available information, the member of JoyceMadgra LLC is an individual who is a citizen of Texas. The members of the Kogod Family Group, LLC are citizens of Florida, New York, Texas, and Virginia. Based on available information, the partners of MC II Associates are individuals who are citizens of New York. The member of MMS Bradley, LLC is an individual who is a citizen of Virginia. The partners of Texas Yarrow – 2021 PS and Texas Yarrow – 2022 PS are individuals who are citizens of Texas. Ashford Phoenix therefore is a citizen of California, Florida, Georgia, Illinois, Maryland, New York, Pennsylvania, Texas, and Virginia.

5. Defendant Ashford Hawthorne LP (“*Ashford Hawthorne*”) is a limited partnership organized under Delaware law. Ashford Hawthorne’s partners are Ashford Hawthorne GP, LLC and Ashford Senior A LLC. Ashford Senior A LLC also is the sole member of Ashford Hawthorne GP, LLC. The sole member of Ashford Senior A LLC is Ashford Junior A LLC. The sole member of Ashford Junior A LC is Ashford Hospitality Limited Partnership. Ashford Hospitality Limited Partnership’s partners are Ashford OP General Partner LLC, Ashford OP Limited Partner, LLC, 1080 Partners LP, A7PP Holdings HSV LLC, AMS Burning Tree, LLC, Arden Seven Penn Partners, LP, Ashford Financial Corporation, Ashford Hospitality Trust, Inc., JoyceMadgra LLC, Kogod Family Group, LLC,

MC II Associates (a partnership), MMS Bradley, LLC, Texas Yarrow – 2021 PS (a partnership), Texas Yarrow – 2022 PS (a partnership) and various individuals, individual trusts, and a decedent’s estate that are citizens of California, Florida, Georgia, Illinois, Maryland, New York, Pennsylvania, Texas, and Virginia. The sole member of Ashford General Partner LLC and Ashford OP Limited Partner LLC is Ashford Hospitality Trust, Inc., which is a Maryland corporation with its principal place of business in Maryland. Based on available information, the partners of 1080 Partners LP are 5280 Holding Corp., which is a Texas corporation with its principal place of business in Texas, and individuals who are citizens of Texas. Based on available information, the partners of A7PP Holdings HSV LLC and Arden Seven Penn Partners, LP, are individuals who are citizens of Pennsylvania. Based on available information, the member of AMS Burning Tree, LLC is an individual who is a citizen of Virginia. Ashford Financial Corporation is a Texas corporation with its principal place of business in Texas. Based on available information, the member of JoyceMadgra LLC is an individual who is a citizen of Texas. The members of the Kogod Family Group, LLC are individuals who are citizens of Florida, New York, Texas, and Virginia. Based on available information, the partners of MC II Associates are individuals who are citizens of New York. The member of MMS Bradley, LLC is an individual who is a citizen of Virginia. The partners of Texas Yarrow – 2021 PS and Texas Yarrow – 2022 PS are citizens of Texas. Ashford Hawthorne therefore is a citizen of California, Florida, Georgia, Illinois, Maryland, New York, Pennsylvania, Texas, and Virginia.

6. Defendant Ashford Plymouth Meeting LP (“*Ashford Plymouth*”) is a limited partnership organized under Delaware law. Ashford Plymouth’s partners are Ashford Plymouth Meeting GP, LLC and Ashford Senior A LLC. Ashford Senior A LLC also is the sole member of Ashford Plymouth Meeting GP, LLC. The sole member of Ashford Senior A LLC is

Ashford Junior A LLC. The sole member of Ashford Junior A LC is Ashford Hospitality Limited Partnership. Ashford Hospitality Limited Partnership's partners are Ashford OP General Partner LLC, Ashford OP Limited Partner, LLC, 1080 Partners LP, A7PP Holdings HSV LLC, AMS Burning Tree, LLC, Arden Seven Penn Partners, LP, Ashford Financial Corporation, Ashford Hospitality Trust, Inc., JoyceMadgra LLC, Kogod Family Group, LLC, MC II Associates (a partnership), MMS Bradley, LLC, Texas Yarrow – 2021 PS (a partnership), Texas Yarrow – 2022 PS (a partnership) and various individuals, individual trusts, and a decedent's estate that are citizens of California, Florida, Georgia, Illinois, Maryland, New York, Pennsylvania, Texas, and Virginia. The sole member of Ashford General Partner LLC and Ashford OP Limited Partner LLC is Ashford Hospitality Trust, Inc., which is a Maryland corporation with its principal place of business in Maryland. Based on available information, the partners of 1080 Partners LP are 5280 Holding Corp., which is a Texas corporation with its principal place of business in Texas, and individuals who are citizens of Texas. Based on available information, the partners of A7PP Holdings HSV LLC and Arden Seven Penn Partners, LP, are individuals who are citizens of Pennsylvania. Based on available information, the member of AMS Burning Tree, LLC is an individual who is a citizen of Virginia. Ashford Financial Corporation is a Texas corporation with its principal place of business in Texas. Based on available information, the member of JoyceMadgra LLC is an individual who is a citizen of Texas. The members of the Kogod Family Group, LLC are individuals who are citizens of Florida, New York, Texas, and Virginia. Based on available information, the partners of MC II Associates are individuals who are citizens of New York. The member of MMS Bradley, LLC is an individual who is a citizen of Virginia. The partners of Texas Yarrow – 2021 PS and Texas Yarrow – 2022 PS are individuals who are citizens of Texas. Ashford Plymouth therefore is a

citizen of California, Florida, Georgia, Illinois, Maryland, New York, Pennsylvania, Texas, and Virginia.

7. Defendant Ashford San Jose LP (“*Ashford San Jose*”) is a limited partnership organized under Delaware law. Ashford Scottsdale’s partners are Ashford San Jose GP, LLC and Ashford Senior A LLC. Ashford Senior A LLC also is the sole member of Ashford San Jose GP, LLC. The sole member of Ashford Senior A LLC is Ashford Junior A LLC. The sole member of Ashford Junior A LC is Ashford Hospitality Limited Partnership. Ashford Hospitality Limited Partnership’s partners are Ashford OP General Partner LLC, Ashford OP Limited Partner, LLC, 1080 Partners LP, A7PP Holdings HSV LLC, AMS Burning Tree, LLC, Arden Seven Penn Partners, LP, Ashford Financial Corporation, Ashford Hospitality Trust, Inc., JoyceMadgra LLC, Kogod Family Group, LLC, MC II Associates (a partnership), MMS Bradley, LLC, Texas Yarrow – 2021 PS (a partnership), Texas Yarrow – 2022 PS (a partnership) and various individuals, individual trusts, and a decedent’s estate that are citizens of California, Florida, Georgia, Illinois, Maryland, New York, Pennsylvania, Texas, and Virginia. The sole member of Ashford General Partner LLC and Ashford OP Limited Partner LLC is Ashford Hospitality Trust, Inc., which is a Maryland corporation with its principal place of business in Maryland. Based on available information, the partners of 1080 Partners LP are 5280 Holding Corp., which is a Texas corporation with its principal place of business in Texas, and individuals who are citizens of Texas. Based on available information, the partners of A7PP Holdings HSV LLC and Arden Seven Penn Partners, LP, are individuals who are citizens of Pennsylvania. Based on available information, the member of AMS Burning Tree, LLC is an individual who is a citizen of Virginia. Ashford Financial Corporation is a Texas corporation with its principal place of business in Texas. Based on available information, the member of

JoyceMadgra LLC is an individual who is a citizen of Texas. The members of the Kogod Family Group, LLC are individuals who are citizens of Florida, New York, Texas, and Virginia. Based on available information, the partners of MC II Associates are individuals who are citizens of New York. The member of MMS Bradley, LLC is an individual who is a citizen of Virginia. The partners of Texas Yarrow – 2021 PS and Texas Yarrow – 2022 PS are citizens of Texas. Ashford San Jose therefore is a citizen of California, Florida, Georgia, Illinois, Maryland, New York, Pennsylvania, Texas, and Virginia.

8. Defendant Ashford LV Hughes Center LP (“*Ashford LV*”) is a limited partnership organized under Delaware law. Ashford LV’s partners are Ashford Scottsdale GP, LLC and Ashford Senior A LLC. Ashford Senior A LLC also is the sole member of Ashford LV Hughes Center GP, LLC. The sole member of Ashford Senior A LLC is Ashford Junior A LLC. The sole member of Ashford junior A LC is Ashford Hospitality Limited Partnership. Ashford Hospitality Limited Partnership’s partners are Ashford OP General Partner LLC, Ashford OP Limited Partner, LLC, 1080 Partners LP, A7PP Holdings HSV LLC, AMS Burning Tree, LLC, Arden Seven Penn Partners, LP, Ashford Financial Corporation, Ashford Hospitality Trust, Inc., JoyceMadgra LLC, Kogod Family Group, LLC, MC II Associates (a partnership), MMS Bradley, LLC, Texas Yarrow – 2021 PS (a partnership), Texas Yarrow – 2022 PS (a partnership) and various individuals, individual trusts, and a decedent’s estate that are citizens of California, Florida, Georgia, Illinois, Maryland, New York, Pennsylvania, Texas, and Virginia. The sole member of Ashford General Partner LLC and Ashford OP Limited Partner LLC is Ashford Hospitality Trust, Inc., which is a Maryland corporation with its principal place of business in Maryland. Based on available information, the partners of 1080 Partners LP are 5280 Holding Corp., which is a Texas corporation with its principal place of business in Texas, and individuals

who are citizens of Texas. Based on available information, the partners of A7PP Holdings HSV LLC and Arden Seven Penn Partners, LP, are individuals who are citizens of Pennsylvania. Based on available information, the member of AMS Burning Tree, LLC is a citizen of Virginia. Ashford Financial Corporation is a Texas corporation with its principal place of business in Texas. Based on available information, the member of JoyceMadgra LLC is an individual who is a citizen of Texas. The members of the Kogod Family Group, LLC are citizens of Florida, New York, Texas, and Virginia. Based on available information, the partners of MC II Associates are individuals who are citizens of New York. The member of MMS Bradley, LLC is a citizen of Virginia. The partners of Texas Yarrow – 2021 PS and Texas Yarrow – 2022 PS are individuals who are citizens of Texas. Ashford LV therefore is a citizen of California, Florida, Georgia, Illinois, Maryland, New York, Pennsylvania, Texas, and Virginia.

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